

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

_____)	
In re)	
)	CHAPTER 11
W.R. GRACE & CO., <i>et al.</i> ,)	CASE NO. 01-01139 (KG)
)	(Jointly Administered)
Debtors.)	
_____)	
)	RE: D.I. 32999

**AGREED MOTION TO EXTEND MARYLAND CASUALTY COMPANY’S TIME TO
FILE REPLY PAPERS WITH RESPECT TO ITS MOTION TO ENFORCE THE
PERMANENT CHANNELING INJUNCTION AND FOR SANCTIONS**

COMES NOW Rose Roberts and files this *Agreed Motion to Extend Maryland Casualty Company’s Time to File Reply Papers with Respect to its Motion to Enforce the Permanent Channeling Injunction and for Sanctions*, respectfully representing as follows:

1. On January 29, 2018, Maryland Casualty Company (“MCC”) filed its *Motion to Enforce the Permanent Channeling Injunction and for Sanctions* (the “Motion”) (D.I. 32999).
2. At Ms. Roberts’ request, MCC agreed to extend the deadline for the filing of Ms. Roberts’ response to the Motion until April 17, 2018, conditioned upon Ms. Roberts obtaining an Order from this Court extending the time for the filing of MCC’s Reply to the Motion to April 23, 2018.
3. A hearing on the Motion is scheduled to be heard on April 25, 2018 at 10:00 a.m., and the parties agree that the hearing should go forward as scheduled.
4. Pursuant to Fed. R. Bankr. P. 9006(d), MCC would be required to file a reply to Ms. Roberts’ response “so as to be received by 4:00 p.m. prevailing Eastern Time the day prior to the deadline for filing the agenda.” The hearing agenda (the “Agenda”) is due April 23, 2018. The day prior to the deadline for filing the agenda is April 20, 2018 (the “Reply Deadline”).

5. Through this Motion, the Rose Roberts respectfully requests that the current Reply Deadline for MCC be extended until April 23, 2018.

6. Based on the foregoing and upon the interest of fairness, Ms. Roberts respectfully requests that the relief sought herein and the attached proposed form of order be granted.

Dated: April 17, 2018

Respectfully submitted,

/s/ Michael Busenkell

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